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Attorneys for Plaintiff DMF, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

DMF, Inc., a California corporation,
Plaintiff,

v.

AMP Plus, Inc. d/b/a ELCO Lighting,
a California corporation; and
ELCO Lighting Inc., a California
corporation,

Defendants.

Civil Action No. 2:18-cv-07090-
CAS-GJS

**[PROPOSED] ORDER
GRANTING PLAINTIFF DMF
INC.'S MOTION FOR
PRELIMINARY INJUNCTION**

Date: December 17, 2018
Time: 10:00 a.m.
Cttrm: 350 W. First Street, Room 8D

Hon. Christina A. Snyder

The Court hereby GRANTS DMF Inc.'s Motion for Preliminary Injunction. The Court ORDERS that until further order of the Court, Defendants AMP Plus, Inc., ELCO Lighting Inc., (collectively "ELCO") and all those acting in concert with ELCO, are prohibited from making, selling, offering to sell, selling, importing into the United States or supplying from the United States ELCO's ELL LED Modules Model Nos. 08xx or 11xx (including ELL0827, ELL0830, ELL0835, ELL0840, ELL08SD, ELL1127, ELL1130, ELL1135, ELL1140 and ELL11SD) referred herein as "the ELCO LED Modules", ELCO's interim design for the ELCO LED Modules, which

1 add a conical metal piece to the back part of these modules (“the Interim ELCO LED
2 Modules”), or any product that is no more than colorably different from the ELCO
3 LED Modules or Interim ELCO LED Modules.

4 It is further ordered that ELCO and all those acting in concert with ELCO are
5 prohibited from inducing anyone to perform the prohibited actions identified in the
6 foregoing paragraph.

7 It is further ordered that ELCO shall recall all ELCO LED Modules and Interim
8 ELCO LED Modules that have entered the United States on or after the date of the
9 filing of the Complaint in this case to the extent that such devices have not been
10 installed in a building by the date of this Order.

11 It is further ordered that ELCO shall, within ten days from the date of issuance
12 of this Preliminary Injunction, provide notice and a copy of this Preliminary Injunction
13 to all subsidiaries, affiliates, officers, directors, employees, principals, agents,
14 customers, sales representatives, distributors, online retailers, online discounters,
15 manufacturers, and attorneys that may have any involvement whatsoever in designing,
16 developing, making, having made, using, marketing, selling, servicing, or promoting
17 LED modules, trims designed to twist and lock onto modules, or housings designed to
18 house LED modules, as well as any other person or entity acting in active concert or
19 participation with ELCO with respect to any of the activities enjoined here. ELCO
20 shall provide counsel for DMF with an affidavit identifying the names, titles,
21 addresses, and telephone numbers of the persons that ELCO has served with a copy of
22 this Order in compliance with this provision.

23 IT IS SO ORDERED.

24
25 DATED: _____

26 HON. CHRISTINA A. SNYDER
United States District Court

27 Submitted by:
28 Ben M. Davidson (State Bar No. 181464)
ben@dlgla.com

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